

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN T. DOE and JOHN U. DOE,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 25-cv-4354
THE CATHOLIC BISHOP OF CHICAGO, a)	
Corporation sole, and THE ARCHDIOCESE)	District Judge LaShonda A. Hunt
OF CHICAGO,)	
)	Cook County Case Nos. 24 L 14871
Defendants.)	24 L 14875
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)	
THE CATHOLIC BISHOP OF CHICAGO, a)	
corporation sole,)	
Plaintiff,)	
)	
v.)	
)	
JOHN T. DOE, JOHN U. DOE, DOE 101)	
DOE 102, DOE 103, DOE 104, and DOE 105)	
)	
Defendants.)	

COUNTER-DEFENDANTS' MOTION TO SEAL ECF NO. 1 AND ECF NO. 1
EXHIBITS 1-1 to 1-4

Counter-Defendants, JOHN T. DOE and JOHN U. DOE (“Counter-Defendants”), by and through their respective counsel, and pursuant to Local Rule 26.2, hereby move this Court for an Order Sealing ECF No. 1, including all Exhibits 1-1 through 1-4, and in support thereof state as follows:

1. On April 22, 2025, Counter-Defendants inadvertently filed a document titled Complaint/Notice of Removal with 4 Exhibits that should have had certain information redacted (ECF No. 1.)

2. On April 22, 2025 Counter-Defendants filed an Emergency Motion To Strike ECP No.1 Complaint/Notice of Removal, and its five exhibits, labeled as Exhibits A-D.

3. On April 23, 2025, this Court granted Counter-Defendants' emergency motion (ECF 7) and directed the Federal Clerk's office, forthwith, to provisionally seal the Complaint and its exhibits, ECF 1-1 to 1-4, (ECP 1) by April 25, 2025.

4. Good cause exists pursuant to LR 26.2 to provisionally seal ECF 1 and its exhibits ECF 1-1 to 1-4, as the Counter-Defendants inadvertently failed to redact certain confidential information in their Complaint/Notice of Removal regarding the identities of the Counter-Defendants and other John Does. The Counter-Defendants and other John Does are victims of alleged sexual abuse and thereby require protection of their identities.

5. Accordingly, to correct the inadvertent filing error, Counter-Defendants are requesting this Court grant their motion to seal ECF No. 1, including all the Exhibits 1-1 through 1-4.

6. Moreover, pursuant to this Court's April 23, 2025 order ECF No. 7 and LR 26.2(c)(1), Counter-Defendants are simultaneously filing a public-record redacted version of the Complaint/Notice of Removal.

WHEREFORE, Counter-Defendants JOHN T. DOE and JOHN U. DOE, hereby request an Order granting Counter-Defendants' Motion to Seal ECF No. 1, including all the Exhibits 1-1 through 1-4, and any other relief this Court deems appropriate.

Dated: April 25, 2025

Respectfully Submitted,

/s/ Alexander Michael
Alexander Michael
Ettinger and Associates
12413 S. Harlem Avenue, #203
Palos Heights, IL 60463

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, the foregoing was electronically served on all counsel of record in this case via the Court's ECF system.

/s/Alexander Michael